

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)

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Chapter 11

Subchapter V

In re:

**ALEXANDRE DACOSTA and
VIVIANNE ANTUNES,

Debtors.**

Case No. 22-18303 JKS

(Jointly Administered)¹

Hearing Date: TBD

**NOTICE OF MOTION FOR AUTHORIZATION TO SELL AUTOMOBILE FREE
AND CLEAR OF LIENS AND INTERESTS PURSUANT TO BANKRUPTCY CODE
SEC. 363(b) AND (f) AND FOR APPROVAL OF SUCH SALE SUBJECT TO HIGHER
AND BETTER OFFERS, FOR PAYMENT OF ALLOWED EXEMPTIONS,
AND FOR RELIEF FROM THE 14-DAY STAY OF FED. R. BANKR. P. 6004(h)**

Alexandre Dacosta and Vivianne Antunes, the individual Debtors in the above-captioned jointly-administered case, respectfully move for an order authorizing them to sell their interest in a certain 1988 BMW 325i automobile subject to higher and better offers, for relief from the 14-day stay of Rule 6004(h), and for payment of their allowed exemptions from the sales proceeds. **Your rights may be affected.** You should read these papers carefully and discuss them with your lawyer, if you have one on this case. (If you do not have a lawyer, you may wish to consult one.)

If you do not want the court to enter the requested order, or if you want the court to consider your views on the motion, or if you want to present a competing offer to purchase the vehicle, then within the time set forth in the accompanying Order Shortening Time and in the manner prescribed therein, you or your lawyer must present your position to the court. In the event that you are required to present written opposition, or if you wish to do so, you or your lawyer must file with the court a written response or answer explaining your position, and send a copy to:

¹ The jointly administered Debtors are Alexandre Dacosta and Vivianne Antunes, having SSNs with the last four digits of 2325 and 0411, respectively, and BAV Auto, L.L.C., having a TIN with the last four digits 7479.

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If you mail your response to the Court for filing, you must mail it early enough so the Court will receive it in advance of the hearing date.

HEARING SCHEDULED TO BE HELD BEFORE:

Honorable: John K. Sherwood, U.S.B.J.

Date:

Time:

Place: King Federal Building, 50 Walnut Street, Newark, NJ 07102
Courtroom 3B

APPEARANCES MAY BE MADE TELEPHONICALLY
THROUGH COURT SOUTIONS

Pursuant to D.N.J. LBR 9013-1(f), the movant waives oral argument unless opposition to the motion is filed or the court requires appearances

A copy of the proposed order that the Debtors seeks is enclosed with this Motion.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and may enter the order requested therein.

NORGAARD, O'BOYLE & HANNON
Attorneys for Debtors

Dated: March 15, 2023

/s/ John O'Boyle
John O'Boyle, Esq.